

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE: ASHLEY MADISON CUSTOMER
DATA SECURITY BREACH LITIGATION

This Document Relates to:

ALL CASES

MDL No. 2669

Case No. 4:15-MD-02669-JAR

**PLAINTIFFS' MOTION FOR LEAVE TO FILE
PLAINTIFFS' MEMORANDUM IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF SETTLEMENT
IN EXCESS OF PAGE LIMITATIONS**

Plaintiffs respectfully request leave to file their Memorandum in Support of their Motion for Final Approval of Settlement in excess of page limitations. In support of their motion, Plaintiffs state as follows:

1. The parties have reached a settlement agreement in this multi-district class action litigation, and the Court has granted preliminary approval of the settlement. Pursuant to the Court's Order of July 21, 2017, the parties now seek final approval of the settlement.
2. Plaintiffs are submitting a Memorandum in Support of the Motion for Final Approval setting forth, in detail, the factual and legal reasons why the motion should be granted.
3. Pursuant to Eastern District of Missouri Local Rule 4.01, Plaintiffs must seek leave of Court to file any motion or memorandum in excess of 15 numbered pages.
4. Plaintiffs' Memorandum in Support necessarily describes and/or addresses numerous complex legal and factual and legal issues relating to the settlement, including: (1) the background and history of the case and settlement, (2) the applicable legal standards; (3) the benefits of the class settlement; (4) the complexity and expense if litigation were continued; (5)

the lack of significant objection or opposition to the settlement; (6) the reasons why the notice provided to the Class was sufficient; (8) why the one objection to the settlement should be overruled; and (9) legal analysis as to why approval of the settlement should be granted.

5. While Plaintiffs' Memorandum in Support is as concise as possible, due to the necessity of addressing each of the above issues, Plaintiffs' Memorandum in Support is 30 pages.

6. For the reasons set forth above, Plaintiffs respectfully request leave to file their Memorandum in Support of their Motion for Final Approval of Settlement in excess of page limitations.

WHEREFORE Plaintiffs respectfully request leave to file their Memorandum in Support of their Motion for Final Approval of Settlement in excess of page limitations, and for any other relief the Court deems just, the premises considered.

Date: October 20, 2017

Respectfully Submitted,

THE DRISCOLL FIRM, P.C.

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Plaintiffs' Settlement Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties.

/s/ John J. Driscoll